



# **COMMERCIAL TOWABLE DEVICE (CTD) OPERATING STANDARDS AND GUIDELINES (CTD-OSAG)**

**(2011)**

All NACWO MEMBERS  
Are required to adhere to CTD guidelines,  
at all time while engaged in commercial towing activities.

Failure to comply with the following guidelines may result  
in immediate suspension or cancellation of your membership.

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**SECTION ONE**  
**GENERAL RULES AND REGULATIONS**

**CTD-OSAG-01. COMMERCIAL TOWABLE DEVICE (CTD) DEFINITION.**

A CTD shall, for the purpose of these guidelines, be defined as; a manufactured for commercial use ancillary device which is attached to a motorized vessel with a towline and used to tow passengers for the purpose of recreational enjoyment and/or passenger shuttle operations. A CTD is commonly referred to as a “Banana Boat” or “Water-Boggin.”

**CTD-OSAG -02. CITY, STATE AND FEDERAL RULES AND REGULATIONS.**

All operators are required to abide by all applicable Local, State, and Federal laws, which may include USCG requirements. Current guidelines are in addition to existing Local, State and Federal Rules governing safe boating practices.

**CTD-OSAG-03. OPERATOR CONDUCT.**

All NACWO Member Operators shall at all time conduct themselves in a professional and prudent manner, and shall employ a zero tolerance policy for deviation from CTD guidelines as a minimum standard and must at all times place passenger safety first. At no time shall any operator insist a tow-vessel captain operate under any condition he or she feels to be unsafe or dangerous to a passenger or participant.

**CTD-OSAG REG-04. GUIDELINE ADHERENCE.**

All operators shall at all time, while engaged in towing operations, comply with all adopted CTD guidelines, unless an approved special circumstance preclusion waiver has been issued.

**CTD-OSAG-05. INSURANCE REQUIREMENTS.**

All operators shall at all time while in operation be required to maintain a valid insurance Policy. The policy shall be written through an approved carrier and must meet the following minimum requirements.

1. Carrier must be approved in the state and/or region in which operations are conducted.
2. Must have a current minimum A.M. Best rating of A- if operating within the United States.
3. Must have an acceptable rating relative to specific region if operating outside of the US.

**CTD-OSAG – 06. ASSUMPTION OF RISK RELEASE.**

Without exception all operators shall require all passengers of legal age or if a minor; a parent or legal guardian to read and sign an assumption of risk and release of liability waiver prior to boarding the vessel or CTD. In addition all operators shall use only those waivers provided by and/or approved by operator’s insurance underwriters. Under no circumstances shall any operator alter or manipulate any release documentation without prior written consent from such underwriters. All release documentation shall be made readily available and maintained for a period of no less than five (5) years.

**CTD-OSAG-07. MANUFACTURER’S REQUIREMENTS.**

All operators shall at all time adhere to all equipment manufacturers specifications, recommendations and guidelines.

**CTD-OSAG-08. DOCUMENTATION.**

All operators shall utilize the following documentation during towing operations and legible copies of such documentation shall at all time be maintained onsite and made readily available.

1. A current set of CTD Guidelines
2. A current set of Equipment Maintenance, Inspection and Weather logs
3. An approved Incident Report Form
4. Current proof of insurance

**CTD-OSAG-09. INCIDENT REPORTING.**

All Operators must immediately report to all applicable insurance carriers and/or other agencies which may be required by Local, State and Federal law, any known or participant implied injury resulting in:

1. a death or disappearance of a person.
2. an injury causing a person to require medical attention beyond First Aid.
3. damage to the unit and/or other property of \$1000.00 or more.

**SECTION TWO**  
**GENERAL OPERATING REQUIREMENTS**

**CTD-OSAG -10. RULES OF THE ROAD.**

In addition to USCG rules of the road, vessels while engaged in towing activities should not assume themselves to be considered a RAM vessel (Restricted in their Ability to Maneuver) and should, if necessary, be prepared to give way to other vessels.

**CTD-OSAG-11. PERSONAL FLOTATION DEVICE (PFD).**

All CTD passengers regardless of age shall at all time wear a properly fitted and securely fastened USCG approved Personal Flotation Device (PFD), which must be donned prior to boarding the CTD. In addition, while engaged in passenger transfer or shuttle operations, all passengers shall wear a USCG approved, properly fitted and securely fastened PFD and such PFD’s must be donned prior to boarding the vessel and/or CTD.

#### **CTD-OSAG-12. VESSEL OPERATOR CONDUCT.**

Towing operations may only be conducted under the following conditions and only after the Captain has made reasonable judgment prior to each and every tow excursion that such operations can be conducted safely. Extreme caution shall at all time be exercised.

1. At no time shall tow vessel speed exceed 20mph.
2. Operator shall reduce speed to idle and use extreme caution when approaching fallen rider(s).
3. Vessel's propulsion system must be placed in neutral whenever operator is in close proximity to any fallen rider.
4. Operator shall avoid excessive speed and/or sharp turns which may cause the CTD to capsize.
5. All vessels, while towing, shall at all times maintain a safe operating distance from all other vessels, docks, objects and shore lines.
6. Vessel operator shall, whenever possible, avoid rough water and large wakes and shall always reduce speed and use caution when encountering rough water and/or when crossing large boat wakes.
7. Operator shall always slowly remove towline slack prior to increasing tow speed.
8. Vessels towline, when not attached to a CTD, shall be stowed immediately aboard the tow-vessel.

#### **CTD-OSAG-13. SECONDARY LOOKOUT.**

An appointed secondary lookout shall be required at all time while towing operations are conducted. It shall be the responsibility of the captain to appoint a designated secondary lookout. In addition, the captain shall ensure that the lookout is at all time monitoring passengers while conducting towing operations. The lookout shall be a minimum of 16 years of age and shall be located either onboard the tow-vessel or stationed at the furthest aft seating position on the CTD.

#### **CTD-OSAG-14. PASSENGER CAPACITIES.**

All CTD units shall be subject to applicable passenger limits and weight capacity requirements as designated by the manufacturer. In addition, at no time shall any tow-vessel captain operate with more than twelve (12) passengers aboard a CTD.

#### **CTD-OSAG-15. SPECIFIED USE.**

Under no circumstance shall any equipment be utilized outside the parameters for which it was designed. In addition, all manufacturer's specifications and/or recommendations shall be observed.

#### **CTD-OSAG-16. OPERATING AREAS.**

No CTD shall be operated;

1. without first establishing a clearly designated operating area.
2. prior to ensuring the operating area is free and clear of debris and/or obstacles and/or shallow waters which may present a safety hazard.
3. prior to sunrise, during dusk or after sunset.

**CTD-OSAG-17. WEATHER AND WATER CONDITION EVALUATION.**

It shall be the responsibility of the Captain to evaluate and determine if weather and water conditions are favorable for towing operations and he or she shall use all means available to make such a determination prior to conducting towing operations. In addition, no operator shall conduct operations in conditions he or she feels to be unsafe.

**CTD-OSAG-18. ADVERSE WEATHER.**

No operator shall knowingly allow any towing operations to be conducted;

1. in excessively large or dangerous seas and/or surf.
2. in excessively confused or wind chopped waters.
3. in strong or potentially dangerous currents and/or wind.
4. in potentially dangerous shallow waters.
5. in rain, heavy fog or during a known lightning storm within 5 miles from the designated operating area.
6. during an active small craft advisory and/or adverse weather warning or alert.
7. if it becomes evident that a storm frontal system is approaching within 7 miles from the designated operating area.

**CTD-OSAG-19. ENVIROMENTAL CONCERNS.**

Operator shall at all time consider the environment and conduct operations in a manner sensitive to environmental impact with regard to plant, animal, terrain, aquatic life, and any other vulnerable elements.

**SECTION THREE**  
**PARTICIPANT REQUIREMENTS**

**CTD-OSAG-20. MINIMUM AGE AND WEIGHT REQUIREMENTS.**

Children may participate in towing activities only after management has made reasonable prior judgment that wind, sea, and weather conditions are conducive to such activities and extreme caution should be exercised. In addition the following guidelines shall be observed;

1. At no time shall any operator allow a child weighing less than sixty five (65) pounds to participate in towing activities.
2. The weight of a minor participant shall be verbally verified by a parent or guardian.
3. All children regardless of weight must wear a USCG approved, properly fitted and securely fastened PFD at all time while onboard the CTD and it shall be donned prior to boarding.
4. It shall be the responsibility of the Tow-vessel Captain or ROM to ensure that all small children and/or adults are at all time seated in a position forward of heavier passengers.
5. A designated older companion must accompany children under the age of 12 while on board the CTD.
6. All children under the age of 12 must wear a USCG approved, properly fitted and securely fastened PFD at all time while onboard the tow-vessel unless otherwise required by USCG, Local, State or Federal regulations.

## **SECTION FOUR**

### **PARTICIPANT HANDLING REQUIREMENTS**

#### **CTD-OSAG-21. PARTICIPANT SAFETY BRIEFING.**

Prior to embarking and before any towing activities commence, all participants shall be given a thorough safety briefing. It shall be the responsibility of the Captain to ensure that the briefing is thorough and informative and captures the undivided attention of all participants. In addition, all participants shall be required to verbally acknowledge that they have been adequately briefed and instructed and that they fully understand the following;

1. A description of the activity itself and potential dangers.
2. Passengers shall conduct themselves in a safe and prudent manner.
3. Passengers shall not intentionally attempt to remove themselves or any other person from the CTD.
4. Passengers at no time shall attempt to capsize the CTD.
5. Proper CTD and vessel boarding and transferring procedures during shuttle operations.
6. Location and operational procedures of safety equipment.
7. How to re-board in the event of capsizing or falling off the CTD.
8. How to right the CTD in the event of a capsize.
9. Safety precautions while engaged in the activity.
10. Safety precautions and procedures in the event of an emergency.
11. All passengers must wear a USCG approved properly fitted and secured PFD at all time while onboard the CTD.
12. It is prohibited to strap or attach themselves and/or any other person to the CTD.
13. It is prohibited to place arms, legs or feet through tow bridle, straps or grab handles.
14. Instructions regarding possible hazards, such as aggressive and/or evasive maneuvers.
15. Instruction regarding the proper use of hand and sound signals.
16. The potential dangers of tow rope recoil.
17. Precluding any passenger or participant that may be afraid or intimidated prior to launching the CTD.
18. Question and answer period.
19. Participants full understanding and verbal acknowledgement of safety instructions.

## **SECTION FIVE**

### **EQUIPMENT REQUIREMENTS**

#### **CTD-OSAG-22. COMMERCIAL TOWABLE DEVICE (CTD) TYPES.**

All CTDs shall meet the following minimum requirements;

1. Shall be a professionally manufactured, for commercial use, inflatable type device.
2. Shall comply with all applicable USCG requirements.
3. Shall be kept clean, well maintained and in excellent working condition.
4. Shall meet an overall minimum length of 13 feet.
5. Shall meet an overall minimum width of 4.5 feet.
6. Passenger hand holds shall be a minimum distance of 2 feet apart.

### **CTD-OSAG-23. TOWLINE REQUIREMENTS**

Operator shall adhere to all manufacturer's requirements.

1. Towline tensile strength shall be no less than 3,800lbs.
2. A towline length of no less than 50' and no more than 65' shall be utilized.
3. Towline shall be well maintained and replaced at intervals recommended by manufacturer and/or when signs of excessive wear and/or deterioration are found.
4. Bungee or elastic materials shall not be used as a towline.
5. Towline attachment mechanisms and procedures must be in accordance with manufacturers recommendations.
6. Towline shall be marked at half the distance between tow-vessel and CTD using a brightly colored material.

### **CTD-OSAG-24. TOW-VESSEL REQUIREMENTS.**

It shall be the responsibility of the captain in charge to make certain that the tow-vessel is maintained and is properly equipped in a seaworthy condition. A current written log shall be kept of all inspections and maintenance performed on tow-vessel.

Seaworthy means properly constructed, suitably prepared, competently manned (a captain and crew of good character and nautical skill), properly laden, sufficiently strong, staunch and competently equipped with appropriate appurtenances to allow it to safely engage in the trade and voyage intended.

In addition, all tow-vessels shall meet the following minimum requirements;

1. A tow-vessel captain who meets NACWO "Tow-Vessel Captain" requirements as outlined in CTD-OSAG-35 shall be aboard the tow-vessel at all time during operation.
2. Vessel shall at all times have a secondary lookout aboard unless fitted with adequate equipment capable of allowing the captain to continuously monitor riders. This includes, but is not limited to a wide angle rearview mirror of no less than 5" by 10" in size or a video monitoring system configured to adequately observe passengers at all time while being towed, unless otherwise required by USCG, Local, State or Federal regulations.
3. When utilizing a PWC as a towing vessel, operator and/or secondary lookout shall, at all time, wear a USCG properly fitted and securely fastened PFD.
4. Operator shall utilize a brightly colored orange flag to signal to others that a rider is in the water. Such flag must be at least one square foot in size and shall be mounted to a pole or handle of not less than 24" in length. Such flag shall be immediately hoisted upon any passenger entering the water and shall remain hoisted until all passengers have safely exited the water.

**CTD-OSAG-25. PASSENGER TRANSPORT OPERATIONS.**

It shall be the captain's responsibility to evaluate, determine and ensure that conditions are favorable and can be safely carried out prior to allowing passenger transport operations to be conducted. In addition, all operators shall adhere to the following minimum standards while engaged in passenger transport operations;

1. All participants shall at all time wear a USCG approved, properly fitted and secured PFD while transferring to and/or from any vessel and/or CTD. All passengers shall be required to don PFD's prior to being allowed to participate in transfer operations.
2. Vessel's propulsion system must be placed in neutral whenever passenger transfer operations are conducted.
3. If operating in a surf zone, it shall be the responsibility of the Captain to determine the appropriate timing for safe launch. Launching a CTD shall always be conducted during a lull in wave sets.
4. Prior to transferring any passenger from CTD to vessel or vessel to CTD, the CTD and vessel shall be temporarily secured to one another.
5. Crew shall use extreme caution at all time and assist each and every passenger while conducting transfer operations from CTD to vessel and/or vessel to CTD.

**CTD-OSAG-26. USCG APPROVED SAFETY EQUIPMENT.**

Operators shall use only USCG approved safety equipment in good condition and in such quantities as required by law.

**CTD-OSAG-27. REQUIRED SAFETY EQUIPMENT.**

All tow-vessels must be equipped with at least one fully functional VHF radio and/or other reliable form of communication sufficient to contact emergency services and/or base of operations. In addition a First Aid Kit and whistle shall be located onboard at all time. All personnel must be aware of the location of this equipment and proficient in its use.

**OSAG -28. WATER EVACUATION EQUIPMENT.**

Tow-vessels not equipped with a swim step must have a ladder sufficient in construction to facilitate heavy passenger extraction from the water.

**CTD-OSAG-29. OTHER RECOMMENDED SAFETY EQUIPMENT.**

Emergency Blanket  
Soft Form of Head Protection  
Bottled Water  
Dry Towels  
Cell Phone

## **SECTION SIX**

### **EQUIPMENT MAINTENANCE AND INSPECTION LOGS**

#### **PWC-OSAG-30. DAILY EQUIPMENT INSPECTION**

It shall be the responsibility of the Captain to ensure that the CTD and other related equipment is inspected daily, prior to the commencement of operations. In addition, any equipment which a reasonable and prudent person would consider damaged and/or worn, so as to create a potential hazard to life or health, shall not be utilized.

#### **CTD-OSAG-31. EQUIPMENT MAINTENANCE**

All CTD's shall at all time be well maintained and kept in proper working condition. It shall be the responsibility of the Captain to ensure that the CTD is at all time properly maintained in accordance with manufactures maintenance specifications, recommendations and guidelines.

#### **CTD-OSAG-32. DAILY TOW-VESSEL PRE-LAUNCH INSPECTION**

It shall be the responsibility of the Captain to carry out pre-launch equipment inspections to ensure that;

1. all controls are in proper working order.
2. throttle and/or kill switch are properly functioning.
3. hull is inspected for damage and is in seaworthy condition.
4. all required safety equipment is on board and in proper working condition.
5. the engine is test started to ensure proper and reliable performance.
6. electrical systems are functioning properly.
7. fuel system, hoses and connections are free of leaks and are in good condition.

#### **CTD-OSAG-33. DAILY CTD PRE-LAUNCH INSPECTION**

It shall be the responsibility of the Captain to carry out pre-launch equipment inspections to ensure that;

1. Towline, D-ring connectors and bridle are free of damage, securely fastened and are in good working condition.
2. CTD is free of punctures, leaks and/or damage.
3. CTD is properly inflated in accordance with all manufacturer's recommendations.

## **SECTION SEVEN**

### **CREW EXPERIENCE REQUIREMENTS**

#### **CTD-OSAG-34. RENTAL OPERATIONS MANAGER (ROM) REQUIREMENTS.**

All operators are required to ensure that at least one NACWO registered ROM is onboard the vessel at all time while CTD operations are conducted. It shall be the operator's responsibility to ensure that the ROM meets the following minimum requirements and written verification shall be provided using a NACWO Experience Verification Form (EVF).

Note: ROM candidates are authorized to work while in the process of meeting minimum experience requirements as long as they are under the direct supervision of an actively registered NACWO ROM.

#### **Qualified Rental Operation Manager (ROM)**

1. Shall be no less than 16 years of age.
2. Must be current in certification of CPR and First Aid.
3. Must be proficient in emergency response procedures, proper use of safety equipment, tow vessel handling skills and operating procedures.
4. Must possess adequate knowledge of Local, State, and Federal laws.
5. Must meet a minimum experience requirement of 40 hours of actual participation in supervising CTD towing operations.
6. Must have successfully completed the on-line or written version of the "CTD-OSAG Review Module."

#### **CTD-OSAG-35. TOW-VESSEL CAPTAIN REQUIREMENTS**

All operators are required to ensure that all tow vessel captains are actively registered as an ROM. It shall be the operator's responsibility to ensure that the Tow-Vessel Captain meets the following minimum requirements. Written verification of meeting such requirements shall be provided using a NACWO Experience Verification Form (EVF).

Note: Tow-vessel Captain candidates are authorized to work while in the process of meeting minimum experience requirements as long as they are under the direct supervision of a NACWO registered ROM.

#### **Qualified Tow-Vessel Captain**

1. Must be USCG Licensed (where applicable) for the appropriate operating area waters and vessel type, size, tonnage and passenger limitations as required by USCG. (or applicable equivalent outside U.S.)
2. Shall be no less than 18 years of age.
3. Must be current in certification of CPR and First Aid.
4. Must be proficient in emergency techniques, procedures and proper use of safety equipment.
5. Must be currently enrolled in an approved random Drug testing program as required by USCG.
6. Must meet a minimum experience requirement of 40 hours of actual participation in conducting CTD towing operations.
7. Must have successfully completed the on-line or written version of the "CTD-OSAG Review Module."
8. Shall be actively registered as a NACWO ROM.